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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF WASHINGTON – YAKIMA DIVISION
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11 KENNETH KLUTH, and STEPHEN
SCHENK,

12 Plaintiffs,
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14 vs.

15 SANTANDER CONSUMER USA
16 INC., and AUTO TRACKERS AND
17 RECOVERY NORTH, LLC,

18 Defendants.
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Case No: 1:17-CV-03149-SAB

**STIPULATION TO CONTINUE
TRIAL AND PRE-TRIAL
DEADLINES**

1 WHEREAS, the parties have scheduled a mediation for July 18, 2018, which
2 they hope will resolve the case; and

3 WHEREAS, the plaintiffs contend they need more time to depose defendant
4 Santander Consumer USA Inc.'s CR 30(b)(6) representative, in order to effectively
5 oppose Santander's pending motion for summary judgment;

6 NOW THEREFORE, the parties in this matter, through the undersigned their
7 counsel of record, hereby stipulate that:

8 1. The trial shall be continued to November 12, 2018 at 9:00 a.m., and the
9 pretrial conference shall be continued to October 29, 2018 at 2:00 p.m., both in
10 Spokane, Washington.

11 2. The discovery cutoff shall be continued to August 17, 2018, for the sole
12 purpose of deposing defendant Santander Consumer USA Inc.'s CR 30(b)(6)
13 representative Jodie Kelch.

14 3. The hearing on defendant Santander Consumer USA, Inc.'s pending
15 motion for summary judgment (Docket No. 39) shall be continued to September 21,
16 2018. Plaintiff's opposition papers shall be due on August 24, 2018, and
17 defendant's reply papers, if any, shall be due on September 7, 2018.

18 4. Motions in Limine shall be filed and served on or before October 3, 2018.
19 Responses shall be filed and served on or before October 10, 2018. Replies shall be
20 filed and served on or before October 17, 2018. Motions in limine shall be noted for
21 hearing at the pretrial conference.

22 5. Exhibit Lists and Witness Lists shall be filed and served and exhibits made
23 available for inspection (or copies provided), on or before October 10, 2018.
24 Objections to the opposing party's witness list or exhibit list and any accompanying
25 briefs shall be filed and served on or before October 17, 2018. Responses, if any, to
26 objections shall be filed and served on or before October 24, 2018.

27 6. The pretrial exhibit stipulation shall be filed on October 24, 2018.

28 7. The parties shall notify the Court on or before October 3, 2018 whether

1 deposition testimony will be used at trial. The Court will then schedule a hearing to
2 review all designated testimony and objections so that a final edited version of the
3 deposition testimony can be prepared for trial.

4 8. A joint Pretrial Order, prepared in accordance with the format provided in
5 Local Rule 16.1(b), shall be filed on or before October 24, 2018 and a copy e-
6 mailed in Word format to the Court at bastianorders@waed.uscourts.gov.

7 9. Trial briefs and voir dire shall be filed by October 22, 2018.

8 10. Proposed jury instructions shall be filed no later than October 22, 2018.
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1 11. All other pre-trial orders and deadlines shall remain in effect as
2 previously ordered.

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5 Dated: June 15, 2018

Respectfully Submitted,
TRUEBLOOD LAW FIRM

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9 By: /s/
Alexander B. Trueblood

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15 By /s/
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